

FILED IN OPEN COURT
U.S.D.C. - Atlanta

SEP 12 2023

By:  KEVIN P. WEIMER, Clerk
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

ABDURRAHIM JALAL

Criminal Indictment

No. **1 : 23 CR - 293**

THE GRAND JURY CHARGES THAT:

Count One

(Bank Theft)

On or about March 29, 2023, in the Northern District of Georgia, the defendant, ABDURRAHIM JALAL, took and carried away, with the intent to steal and purloin, money and things of value exceeding \$1,000 belonging to, and in the care, custody, control, management, and possession of Bank of America, located at 2052 Lawrenceville Highway, Decatur, Georgia, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(b).

Count Two

(Use of Fire or Explosive to Commit a Felony)

On or about March 29, 2023, in the Northern District of Georgia, the defendant, ABDURRAHIM JALAL, did knowingly and intentionally use fire and an explosive to commit a felony which may be prosecuted in a court of the United States, specifically Bank Theft as alleged in Count One of this Indictment,

a violation of Title 18, United States Code, Section 2113(b), all in violation of Title 18, United States Code, Section 844(h).

Count Three

(Fire or Explosive – Malicious Use)

On or about March 29, 2023, in the Northern District of Georgia, the defendant, ABDURRAHIM JALAL, did maliciously damage and destroy and attempt to damage and destroy, by means of fire and an explosive, real and personal property, that is: a Bank of America automated teller machine, located at 2052 Lawrenceville Highway, Decatur, Georgia, which automated teller machine and real and personal property were used in interstate commerce, and in activity affecting interstate commerce, in violation of Title 18, United States Code, Section 844(i).

Count Four

(Possession of Destructive Device)

On or about March 29, 2023, in the Northern District of Georgia, the defendant, ABDURRAHIM JALAL, did knowingly possess a destructive device, as defined in Title 26, United States Code, Sections 5845(a) and (f), which was not registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d) and 5871.

Count Five

(Possession of Destructive Device)

On or about April 29, 2023, in the Northern District of Georgia, the

defendant, ABDURRAHIM JALAL, did knowingly possess a destructive device, as defined in Title 26, United States Code Sections 5845(a) and (f), which was not registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d) and 5871.

Forfeiture Provision

Upon conviction of the offense alleged in Count One of this Indictment, the defendant, ABDURRAHIM JALAL, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds traceable to said offense and, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of the offense. The property to be forfeited includes, but is not limited to, the following:

- (a) MONEY JUDGEMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of the offense alleged in Count One of this Indictment.

Upon conviction of one or more of the offenses alleged in Counts Two and Three of this Indictment, the defendant, ABDURRAHIM JALAL, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of said violations or traceable to said violations and pursuant to Title 18, United States Code, Section 844(c), any

explosive materials involved or used or intended to be used in said violations. The property to be forfeited includes, but is not limited to, the following:

- (a) MONEY JUDGEMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of the offenses alleged in Counts Two and Four of this Indictment.

Upon conviction of one or more of the offenses alleged in Counts Four and Five of this Indictment, the defendant, ABDURRAHIM JALAL, shall forfeit to the United States of America, pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461(c), any firearms involved in said violations and pursuant to Title 49, United States Code, Section 80303, any aircraft, vehicle or vessel involved in said violations.

If any of the property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A True BILL
[Signature]
FOREPERSON

RYAN K. BUCHANAN
United States Attorney

[Signature]
DASHENE A. COOPER
Assistant United States Attorney
Georgia Bar No. 385738